

NO. PD-1279-19

TO THE COURT OF CRIMINAL APPEALS

OF THE STATE OF TEXAS

RAMIRO CASTILLO-RAMIREZ,

Plaintiff-Appellant,

v.

THE STATE OF TEXAS,

Defendant-Appellee.

FILED
COURT OF CRIMINAL APPEALS
1/22/2020
DEANA WILLIAMSON, CLERK

**Appeal from Cause 16-CR-271, Starr County
And No. 04-18-00514-CR, San Antonio Court of Appeals**

**APPELLANT'S FIRST MOTION TO EXTEND TIME FOR FILING HIS REPLY BRIEF
TO STATE'S PETITION FOR DISCRETIONARY REVIEW**

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TO THE HONORABLE COURT OF CRIMINAL APPEALS:

Pursuant to TEX. R. APP. P. 10.5(b) and 68.2(c), the appellant, Ramiro Castillo-Ramirez, files this First Motion to Extend Time to File Appellant’s Reply to State’s Petition for Discretionary Review.

The appellant’s reply brief is due January 22, 2020.

Counsel for the appellant respectfully requests an extension of time to February 6, 2020, or 15 days. This is the first request for extension of time to file the reply brief.

Counsel for the appellant relies on the following reasons: The State filed its Petition for Discretionary Review on January 7, 2020. Counsel has been in misdemeanor and felony courts in Jim Hogg and Starr Counties on January 7, 8, 9, 14, 15, and 16. In addition Counsel also was out of the office from January 17 until January 20 for a pre-planned vacation. Counsel has also been

preparing for a first-degree sentencing hearing in Cause No. 19-CR-135 in the 381st District Court of Starr County, Texas scheduled for January 22, 2020.

While counsel has begun to construct the reply brief in this cause, Counsel believes that the above-mentioned responsibilities will prevent Counsel from devoting the attention needed to complete the brief by the January 22, 2020 deadline.

Counsel for the appellant seeks this extension of time to be able to prepare a cogent and succinct reply brief to aid this Court in its analysis of the issues presented. This request is not sought for delay but so that justice may be done.

All facts recited in this motion are within the personal knowledge of the counsel signing this motion, therefore no verification is necessary under Texas Rule of Appellate Procedure 10.2.

PRAYER FOR RELIEF

For the reasons set forth above, the appellant requests that this Court grant this First Motion to Extend Time to File Appellant's Reply Brief to State's Petition for Discretionary Review and extend the Deadline for filing the Appellant's reply brief up to and including February 6, 2020.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that, on this 21st day of January, 2020, this Motion was served on the State's Prosecuting Attorney and the Starr County District Attorney's Office via certified electronic service provider to:

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